

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF HAWAII

In the Matter of

DOCKET NO. 2008-0274

PUBLIC UTILITIES COMMISSION

Instituting a Proceeding to Investigate
Implementing a Decoupling Mechanism for
Hawaiian Electric Company, Inc., Hawaii
Electric Light Company, Inc., and Maui
Electric Company, Limited

**BLUE PLANET FOUNDATION'S RESPONSE TO THE
DIVISION OF CONSUMER ADVOCACY'S
INFORMATION REQUESTS DATED APRIL 6, 2009**

AND

CERTIFICATE OF SERVICE

PUBLIC UTILITIES
COMMISSION

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FILED

SCHLACK ITO LOCKWOOD PIPER & ELKIND
Douglas A. Codiga, Esq.
Topa Financial Center
745 Fort Street, Suite 1500
Honolulu, Hawaii 96813
Tel. (808) 523-6047

Attorney for Blue Planet Foundation

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**BLUE PLANET FOUNDATION'S RESPONSE TO THE
DIVISION OF CONSUMER ADVOCACY'S INFORMATION REQUESTS
DATED APRIL 6, 2009**

Blue Planet Foundation ("Blue Planet"), by and through its attorneys Schlack Ito
Lockwood Piper & Elkind, hereby responds to the Division of Consumer Advocacy's
Information Requests dated April 6, 2009.

CA/BPF-IR-1

In its March 30 Initial Statement of Position at page 6, BPF states, "Blue Planet favors a more formal *quid pro quo* arrangement for several reasons." Please describe and explain each element of the "more formal *quid pro quo*" that is being recommended by BPF, indicating each metric to be employed and how performance relative to each metric would be scored and translated or applied for ratemaking purposes to accomplish the desired, "...linking [of] these commitments to RAM benefits."

RESPONSE:

At this time, Blue Planet recommends further consideration by the parties to this proceeding of the following potential performance metrics: (1) the number of new net energy metered customers interconnected to the system during the year; (2) the increase in nonfossil-based kilowatt-hour generation during the year; (3) the increase in the number of customers

signed up in the Pay-as-You-Save Solar Program during the year; (4) the amount of new renewable energy (kilowatt-hours) purchased through the feed-in tariffs during the year; (5) the decrease in the amount of fossil oil used during the year; and (6) the increase in the energy savings (kWh) resulting from energy efficiency programs and demand-side programs. Blue Planet and the parties may identify additional performance metrics in the course of this proceeding. At this time, Blue Planet has not developed a mechanism for linking performance under such metrics to any Revenue Adjustment Mechanism benefits.

CA/BPF-IR-2 **In its March 30 Initial Statement of Position at page 6, BPF states, "Blue Planet favors a more formal quid pro quo arrangement for several reasons." Please provide a schedule listing and quantifying each of the "commitments" that BPF believes should be linked into RAM rate adjustments in each available future year.**

RESPONSE:

Please see Response to CA/BPF-IR-1, above.

CA/BPF-IR-3 **Please provide specifics illustrative calculations that BPF has developed to show how future HECO performance relative to the "commitments" listed in your response to CA/BFP-IR-2 should be linked into the RAM mechanism.**

RESPONSE:

Please see Response to CA/BPF-IR-1, above.

CA/BPF-IR-4 **Please provide complete copies of all calculations, spreadsheet files, workpapers, surveys and other documents associated with each of the efforts described in your responses to CA/BPF-IR-1 through CA/BFP-IR-3 of this information request.**

RESPONSE:

Please see Response to CA/BPF-IR-1, above.

CA/BPF-IR-5

To the extent not provided in response to CA/BPF-IR-1 through CA/BFP-IR-4, above, please provide complete copies of all other calculations, spreadsheet files, workpapers, surveys, documentation and other analyses supporting the conclusions and recommendations stated in your Initial Statement of Position.

RESPONSE:

Please see Response to CA/BPF-IR-1, above.

DATED: Honolulu, Hawaii, April 15, 2009.



DOUGLAS A. CODIGA
Attorney for Blue Planet Foundation

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date a copy of the foregoing document was
duly served upon the following individuals by placing a copy of same in the United States Mail,
postage prepaid, and/or by electronic service, as follows:

Catherine P. Awakuni
Executive Director
Division of Consumer Advocacy
335 Merchant Street, Room 326
Honolulu, Hawaii 96813

2 Copies by U.S. Mail and
Electronic Service

Dean K. Matsuura
Manager, Regulatory Affairs
Hawaiian Electric Company, Inc.
Hawaii Electric Light Company, Inc.
Maui Electric Company, Ltd.
P. O. Box 2750
Honolulu, Hawaii 96840-0001

Electronic Service

Jay Ignacio
President
Hawaii Electric Light Company, Inc.
P. O. Box 1027
Hilo, Hawaii 96721-1027

Electronic Service

Edward L. Reinhardt
President
Maui Electric Company, Limited
P. O. Box 398
Kahului, Hawaii 96733-6898

Electronic Service

Thomas W. Williams, Jr., Esq.
Peter Y. Kikuta, Esq.
Damon Schmidt, Esq.
Goodsill Anderson Quinn Stifel LLC
1099 Alakea Street, Suite 1800
Honolulu, Hawaii 96813

Electronic Service

Attorneys for Hawaiian Electric Company, Inc.
Hawaii Electric Light Company, Inc.
Maui Electric Company, Ltd.

Randall J. Hee, P.E.
President and CEO
Kauai Island Utility Cooperative
4463 Pahe'e Street, Suite 1
Lihui, Hawaii 96766-2000

Electronic Service

Timothy Blume
Michael Yamane
Kauai Island Utility Cooperative
4463 Pahe'e Street, Suite 1
Lihue, Hawaii 96766-2000

Electronic Service

Kent T. Morihara, Esq.
Kris N. Nakagawa, Esq.
Rhonda L. Ching, Esq.
Morihara Lau & Fong LLP
841 Bishop Street, Suite 400
Honolulu, Hawaii 96813

Electronic Service

Attorneys for Kauai Island Utility Cooperative

Warren S. Bollmeier, II
President
Hawaii Renewable Energy Alliance
46-040 Konane Place 3816
Kaneohe, Hawaii 96744

Electronic Service

Carl Freedman
Haiku Design & Analysis
4234 Hana Highway
Haiku, Hawaii 96708

Electronic Service

Gerald A. Sumida, Esq.
Tim Lui-Kwan, Esq.
Nathan C. Smith, Esq.
Carlsmith Ball LLP
ASB Tower, Suite 2200
1001 Bishop Street
Honolulu, Hawaii 96813

Electronic Service

Attorneys for Hawaii Holdings, LLC,
dba First Wind Hawaii

Mike Gresham
Hawaii Holdings, LLC, dba First Wind Hawaii
3 Lono Avenue, Suite 380
Kahului, Hawaii 96732

Electronic Service

Deborah Day Emerson, Esq.
Gregg J. Kinkley, Esq.
Deputy Attorney General
Department of the Attorney General
State of Hawaii
425 Queen Street
Honolulu, Hawaii 96813

Electronic Service

Attorneys for the Department of Business,
Economic Development, and Tourism

Mark Duda
President
Hawaii Solar Energy Association
P. O. Box 37070
Honolulu, Hawaii 96837

Electronic Service

DATED: Honolulu, Hawaii, April 15, 2009.



DOUGLAS A. CODIGA
Attorney for Blue Planet Foundation